



TYSON & MENDES

TINA C. MA
TMA@TYSONMENDES.COM
DIRECT: (917) 781-4965

100 PARK AVENUE, 16TH FLOOR
NEW YORK, NY 10017
PHONE: (917) 781-4702 FAX: (917) 725-8799

August 27, 2021

By ECF and Email

(CronanNYSDChambers@nysd.uscourts.gov)

Hon. John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 12D
New York, NY 10007

Re: W.P.V., et al. v. United States of America, et al.
Docket No.: 1:21-CV-04436

Your Honor:

This firm represents Defendant Cayuga Home for Children, Inc. d/b/a Cayuga Centers ("Cayuga") in this action. Sherri Jayson, the attorney that had been handling this matter, recently left this firm's employment. I have taken over the handling of this matter.

With the Plaintiffs' consent, we respectfully request a two-week extension of defendant Cayuga's time to answer and/or file a pre-answer motion to dismiss to September 14, 2021, so that I may get caught up on this matter. The parties continue their attempts to resolve this case, but our discussions have been delayed due to Ms. Jayson's recent departure from the firm.

In addition, we further request a two-week adjournment of the September 2, 2021 deadline for the parties to file a status letter with the Court, so that the parties may engage in meaningful settlement discussions before providing a status letter to the Court. Plaintiff's counsel consents to this application.

Respectfully Submitted,

Tina C. Ma

cc: All Counsel of Record (By ECF Only)

Defendant Cayuga Home for Children, Inc's request is granted. Defendant Cayuga Home for Children, Inc. shall answer, or otherwise respond to, the Complaint by September 14, 2021.

SO ORDERED.
Date: August 31, 2021
New York, New York

JOHN P. CRONAN
United States District Judge